



June 4, 2015

VIA E-MAIL

Chad Breckinridge
Associate Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Twilight Towers Data Collection Response

Dear Mr. Breckinridge,

We are writing in response to your letter of 10 February 2015 requesting data on member companies' holdings of Twilight Towers. On behalf of PCIA and CTIA ("the Associations"), we thank you for being so responsive to the Associations' members on this matter. As we stated in our letter of 6 January 2015, we support the Wireless Telecommunications Bureau's ("WTB") Twilight Tower efforts to develop a solution to clear these towers and appreciate your continued interest in helping propel broadband deployment on existing structures.

Our participating members reviewed the status of their 115,474 communication towers and reported that 4,298 could be classified as Twilight Towers. Using those figures, Twilight Towers make up 4.4% of all towers surveyed. These estimates confirm earlier estimates that the Associations had provided publically. We believe that this data will help the Commission define the scope of this problem and determine the best procedure to use to resolve it.

By developing a solution to clear these Twilight Towers, the FCC will take another important step toward enabling high-speed broadband deployment. Assuming a vacancy rate of one and a half open collocation opportunities on these towers—a conservative estimate—removing Twilight Towers' uncertain regulatory status could open up space for nearly 6,500 new antenna collocations. These additional collocations will enable opportunities to put existing infrastructure to its highest and best use for consumers, enabling wireless providers to expand broadband to more places.

After you have a chance to review these figures, we wish to schedule a meeting to discuss next steps and any necessary coordination with the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, State Historic Preservation Officers, and representatives of Tribal Nations. We look forward to working together with you to develop a solution that owners of Twilight Towers can utilize to quickly and efficiently offer these towers for additional collocation opportunities, yet is sensitive to key cultural and historic resources.

Sincerely,

/s Brian Josef
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cc: Roger Sherman
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